

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
BridgeWave Communications Waiver	)	WT Docket No. 11-25
Request for 150 MHz Wide Channels	)	
at 18 GHz	)	
	)	
	)	

To: The Commission

**Comments of EIBASS**

Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS) hereby respectfully submits its comments in the above-captioned docket relating to a rule waiver to allow up to 150 MHz wide aggregated channels in the 18 GHz band.

**I. EIBASS Has No Objection To the Proposed Rule Waiver**

1. The 17.7–19.7 GHz Private Operational Fixed Service (POFS) band is shared with Part 74, Subpart F, TV Broadcast Auxiliary Services (BAS) stations. However, the Universal Licensing System (ULS) shows just 318 TV BAS fixed-link records, which represents only 3.6% of all TV BAS fixed-link records in the ULS.<sup>1</sup>
2. Because the 18 GHz band is not heavily used by TV BAS, EIBASS has no objection to the proposed waiver, nor the proposed waiver conditions. However, EIBASS would ask that if the

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<sup>1</sup> The ULS shows the following active Part 74 class TS (STL), class TI (ICR) and class TT (TV Translator Relay) records:

Band	Records
2 GHz	569
2.5 GHz	88
7 GHz	5,702
13 GHz	2,416
18 GHz	<u>318</u>
Total	8,823

**EIBASS Comments to WT Docket 11-25: Rule Waiver to Allow  
150 MHz Wide Channels at 18 GHz**

waiver is granted, it be made applicable to TV BAS stations, should a BAS licensee wish to meet the proposed waiver conditions.

Respectfully submitted,

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